

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONVERSATION DIVISION

RECEIVED
2015 AUG 12 A 7 44

**APPLICATION OF LIGHTNING DOCK GEOTHERMAL
HI-01 LLC (FORMS G-112) FOR APPROVAL TO INJECT
INTO A GEOTHERMAL AQUIFER THROUGH THREE
PROPOSED GEOTHERMAL INJECTION WELLS AT
THE SITE OF THE LIGHTNING DOCK GEOTHERMAL
POWER PLANT, HIDALGO COUNTY, NEW MEXICO.**

CASE NO. 15357

**APPLICATION OF LIGHTNING DOCK
GEOTHERMAL HI-01, LLC TO PLACE WELL
NO. 63A-7 ON INJECTION-GEOTHERMAL
RESOURCES AREA, HIDALGO COUNTY, NEW
MEXICO**

**CASE NO. 15365
Order No. R-14021-B**

APPLICATION FOR HEARING

In accordance with Procedural Order R-14021-B, AmeriCulture, Inc. hereby submits its request for hearing regarding Cases Nos. 15357 and 15365, in accordance with 19.14.112.8(A) NMAC.

- (1) The Applicant for hearing is AmeriCulture, Inc., which has filed protests to four applications filed by Lightning Dock Geothermal, HI-01, LLC for geothermal injection permits.
- (2) The name or general description of the common source or sources of supply or the area affected by the order is commonly known as the Lightning Dock Known Geothermal Resource Area, located generally in Township 25 South, Range 19 West, NMPM, Hidalgo County, New Mexico.
- (3) The Order, Rule or Regulation Sought: The Applicant Lightning Dock seeks permits to place four wells on injection within the Lightning Dock Known Geothermal Area corresponding to Cases Nos. 15357 and 15365. AmeriCulture seeks denial of Applicant's permit applications.
- (4) Any Other Matter Required by a Particular Rule or Order of the Division: Presently unknown

Respectfully submitted,
LAKINS LAW FIRM, P.C.




Charles N. Lakins, Esq.
P.O. Box 91357
Albuquerque, NM 87109
Office: (505) 404-9377

CERTIFICATE OF SERVICE

I, Charles N. Lakins, do hereby certify that on August 12, 2015 I served a true and correct copy of this Request for Hearing to:

Allison R. Marks, Esq.
Office of the General Counsel
New Mexico Oil Conservation Division
1220 S. St. Francis Dr.
Santa Fe, NM 87505

Michelle Henrie, Esq.
M Henrie Land and Water Law
PO Box 7035
Albuquerque, NM 87194-7035

A handwritten signature in black ink, appearing to read 'C. N. Lakins', written over a horizontal line.

Charles N. Lakins, Esq.